REMARKS

The Office Action dated March 2, 2005, has been carefully reviewed and the foregoing amendment has been made in response thereto. Claim 20 has been added. Claims 1-20 are pending in the application.

The rejection of claims 1-14 under 35 USC 112, second paragraph, is respectfully traversed. Claim 1 has been amended to even more particularly point out that the pass-through router couples user traffic to the external internet independently of the security service pathways. Thus, the claims are in conformance with 35 USC 112 and the rejection should be withdrawn.

The office action rejected claims 2-14 as being dependent on claim 1, however, claim 14 is independent. Although claim 14 was clear and definite as originally filed, the language added to claim 1 has been added to claim 14 for consistency.

The rejection of claims 1, 2, 4, and 5 under 35 USC 102(e) as being anticipated by Wadlow et al is respectfully traversed. Claim 1 recites a particular network architecture wherein a plurality of security service pathways each provide a respective combination of security service features. A service selection gateway directs user traffic to a respective one of the security service pathways or to a pass-through router in response to a subscriber configuration after initialization by a service selection dashboard.

MPEP §706.02 states that an invention is anticipated by a prior art reference under 35 USC §102 only if the prior art reference teaches every aspect of the claimed invention. Furthermore, in *Paperless Accounting, Inc. v. Bay Area Rapid Transit Sys.*, 804 F.2d 659, 665 (Fed. Cir 1986), the Federal Circuit stated that "[A] §102(b) reference must sufficiently describe the claimed invention to have placed the public in possession of it." Since Wadlow fails to teach all the claimed elements, it does not anticipate claim 1. Specifically, Wadlow fails to disclose security service pathways wherein each pathway provides a respective combination of security service features. The rejection relies on the teaching of Wadlow at column 2, lines 40-46, wherein it is

stated that there is a configurable policy enforcement means. However, there is no explicit teaching or suggestion that the network components are organized to provide separate pathways depending upon the security features to be given, as is required by the present claim. Furthermore, there is no teaching of anything in Wadlow that allows a user to select the security service features to be applied to their user traffic. The rejection relies on the maintenance workstation of Wadlow in connection with this feature of the claimed service selection dashboard, but there is no teaching in Wadlow that any user-specific security customization can be obtained.

The rejection relies on the external router (ER) of Wadlow to show both the pass-through router and the security service router of claim 1. However, these two routers in claim 1 handle distinctly different user traffic independently of one another. Therefore, it is erroneous to suggest that each one is taught by a single component of Wadlow.

The rejection reads the claimed service selection gateway on the customer local router (CLR) of Wadlow. However, the rejection fails to demonstrate how the CLR of Wadlow directs user traffic to different pathways or the pass-through router. This is because Wadlow lacks these distinct pathways as recited in claim 1 and because the CLR does not perform any such function. Therefore, claims 1, 2, 4, and 5 are allowable over Wadlow.

The rejection of claims 14 and 16-19 under 35 USC 102(e) as being anticipated by Barrett is respectfully traversed. Claim 14 is a method claim having limitations similar to claim 1. Claim 14 recites receiving user traffic destined for the external internet at a service selection gateway, determining from a subscription profile which security service features to apply to the user traffic, if the subscription profile for the user includes any security service features, then re-directing the user traffic to a particular security service pathway of a plurality of security service pathways, the particular security service pathway corresponding to the security service features identified by the user profile. If the subscription profile for the user includes no security service features, then the user traffic is re-directed to a pass-through router for coupling the user traffic to the external internet.

Barrett fails to teach all of these aspects of the invention. Specifically, Barrett shows only one pathway for carrying user traffic, i.e., terminal information handler 34. Barrett discloses that terminal information handler could be a plurality of handlers (column 6, lines 56-63), but does not disclose that any such handlers would perform a different security function. Therefore, Barrett fails to disclose either a plurality of security service pathways or the re-directing of user traffic to a particular security service pathway of a plurality of security service pathways, the particular security service pathway corresponding to security service features identified by a user profile. Moreover, Barrett lacks a separate pass-through router and has no teaching of re-directing user traffic to the pass-through router if the user profile has no security service features. Therefore, claims 14 and 16-19 are allowable over Barrett.

The rejection of claims 3 and 6-8 under 35 USC 103(a) as being unpatentable over Wadlow et al in view of Schneider et al is respectfully traversed. Schneider fails to correct for the deficiencies of Wadlow noted above. Therefore, claims 3 and 6-8 are allowable over the cited references.
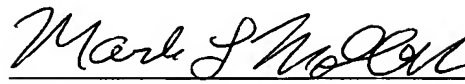
The rejection of claims 9-13 under 35 USC 103(a) as being unpatentable over Wadlow et al in view of Barrett is respectfully traversed. Wadlow and Barrett fail to either teach or suggest the elements of claim 1 as noted above. Therefore, claims 9-13 are allowable over the cited references.

The rejection of claim 15 under 35 USC 103(a) as being unpatentable over Barrett in view of Schneider et al is respectfully traversed. Schneider fails to correct for the deficiencies of Barrett noted above. Therefore, claims 3 and 6-8 are allowable over the cited references.

New claim 20 recites the switches coupled to the opposite ends of the security service pathways and that multiplex and demultiplex the user traffic passing through the pathways. The switches are neither shown nor suggested by the cited references.

In view of the foregoing amendment and remarks, claims 1-20 are now in condition for allowance. Favorable action is respectfully solicited.

Respectfully submitted,

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